

STATEMENT OF BASIS
CSO COMPLIANCE SCHEDULE
CITY OF PORT ANGELES
WASTEWATER TREATMENT FACILITY
NPDES PERMIT NO. WA0023973

The purpose of this Statement of Basis is to explain the decision to modify National Pollutant Discharge Elimination System (NPDES) Permit No. WA0023973 to update the CSO compliance schedule as listed in permit Section S11.F.

I. GENERAL INFORMATION

- A. Permittee: City of Port Angeles
321 East Fifth Street
P.O. Box 1150
Port Angeles, Washington 98362
- B. Treatment Plant Type: Municipal Secondary
- C. Plant Discharge Location: Strait of Juan de Fuca
Latitude: 48° 07' 38" N
Longitude: 123° 23' 53" W
- D. CSO Locations: 001 at Pump Station 1 to the Strait of Juan de Fuca
006 at Oak & Railroad to Port Angeles Harbor
007 at Laurel & Railroad to Port Angeles Harbor
008 at 2nd & Lincoln to Culvert for Peabody Creek
010 at Francis Street to Port Angeles Harbor

II. REQUEST TO CHANGE CSO COMPLIANCE SCHEDULE:

The NPDES permit for the City of Port Angeles Wastewater Treatment Plant includes Special Condition S11 Combined Sewer Overflows (CSO). This Condition in S11.F includes a compliance schedule of activities that the city is to complete during the term of the permit. The schedule was taken from the *City of Port Angeles Combined Sewer Overflow (CSO) Reduction Plan* (January 1994). This plan described how the City planned to reach no more than one CSO event per outfall per year by 2015. The City presently has five CSO that had over 340 CSO events in 2001 that amounted to approximately 35 million gallons of untreated dilute sewage being discharged to the environment.

The City has reexamined some of their planned activities and would like to make some changes. They therefore submitted a request to the Department of Ecology (Ecology) to modify the compliance schedule in the permit. After some discussion with the City, Ecology has agreed to pursue a permit modification similar to what the City requested. The present permit language is as follows:

S11.F.2. No later than December 31, 2003, complete construction of the Pumping Stations 1 and 3 upgrades to maximum pump size.

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The City requested that in lieu of upgrading Pump Station 1, they be allowed to replace the Pump Station with a gravity sewer. This work would also eliminate one of the CSO sites. In lieu of upgrading Pump Station 3, the City would prefer to clean the force main from the Station, which may recover lost capacity for the Station. The City proposed to complete all this work by December 31, 2004. The City stated that these changes will result in significant improvement in the capacity of the wastewater collection system, the elimination of one CSO, and also meet the intent of the compliance schedule requirements to reduce the frequency and volume of CSO events.

The City based these requested changes on information provided in the following reports: *Evaluation of City Pump Station No. 3 Intersection of Hill Street and Marine Drive*, R.W. Beck, October 7, 1997; *Preliminary CSO Reduction Alternative Evaluation*, Brown and Caldwell, September 18, 2002; and *Task 5: Alternatives Analysis – Hydraulic Analysis for Eliminating Pump Station 1 and Routing Flow by Gravity to Pump Station 3*, Brown and Caldwell, October 4, 2002.

Ecology reviewed the reports and proposal and agreed that replacing Pump Station 1 with a gravity line and eliminating the related CSO made sense. Ecology also agreed that cleaning the line from Pump Station 3 was a wise first step, but also determined that if the cleaning is not as effective as hoped, that further work may need to be done.

Ecology is proposing the following schedule to replace the existing S11.F.2:

S11.F.2. No later than December 31, 2003, complete installation of pipeline cleanout (pigging) station adjacent to Pump Station 3, cleaning of the force main, and verification of capacity of Pump Station 3.

S11.F.3. No later than December 31, 2004, complete elimination and replacement of Pump Station 1 with a gravity sewer sized to pass peak flows to Pump Station 3.

S11.F.4. No later than December 31, 2004, complete elimination of CSO 001.

S11.F.5. No later than December 31, 2004, complete work at Pump Station 3 to handle peak 20-year flow.

The upgrade to Pump Station 3 may be accomplished by actions such as the required cleaning of the force main and the pumps achieving their original design capacity of 1,180 gpm, increasing the Pump Station to maximum pump size, constructing storage at the Pump Station, replacing the Pump Station and/or force main, or other actions that achieves the required capacity.

This Statement of Basis will serve as an amendment to the Fact Sheet and Permit.